

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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Federal Communications Commission
Office of Secretary

In the Matter of)
)
Advanced Television Systems)
and Their Impact Upon the)
Existing Television Broadcast)
Service)

MM Docket No. 87-268

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Fifth Further Notice of)
Proposed Rule Making)

FURTHER COMMENTS OF THE DIGITAL HDTV GRAND ALLIANCE

Pursuant to the Commission's Public Notice (FCC 96-465) dated November 27, 1996, the *digital* HDTV Grand Alliance ("Grand Alliance") hereby submits the following comments on a recent agreement reached among various parties regarding technical standards for digital television ("DTV"). This agreement is embodied in a letter to Commissioner Ness dated November 26, 1996, and is signed by the Broadcasters Caucus, the Consumer Electronics Manufacturers Association, and the Computer Industry Coalition on Advanced Television Service. Among other things, these parties agree that no later than December 31, 1996 the Commission should adopt the ATSC DTV Standard (A/53), except for the video format constraints contained therein, as the transmission standard for the nation's next generation of terrestrial broadcast television.

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The Grand Alliance welcomes this agreement and urges the Commission to adopt its provisions, thereby ending the controversy that has delayed adoption of a DTV standard and the introduction of high-definition television (“HDTV”) and other digital television and data services, with their attendant economic benefits. Although we would have preferred to see the entire ATSC DTV Standard (which is based on the Grand Alliance HDTV system) adopted by the Commission, we now believe that the costs and risks of any further delay in establishing a standard outweigh the costs and risks of relying solely on voluntary industry standards for the specific video formats to be used for digital television. Moreover, with rapid Commission adoption of the core DTV technologies, including the Dolby AC-3 audio system, the MPEG-2 video compression techniques, the MPEG-2 packetized data transport structure, and the vestigial sideband (VSB) digital modulation and transmission system, we believe that investors, broadcasters, manufacturers and consumers will have sufficient confidence and certainty to make the further investments required to bring digital television rapidly to market.

In our July 11, 1996 Comments and our August 12, 1996 Reply Comments in this Fifth NPRM we described the substantial benefits to be realized by Commission adoption of the ATSC DTV Standard, including the quantum improvements in the technical quality of free over-the-air television which will allow free TV to compete successfully against other delivery media in the years and decades to come, the wealth of new information services that will also be enabled, the positive impacts on jobs and economic growth that will flow from investing in digital television, and the opportunity to adopt a far more efficient utilization of television spectrum and recover large blocks of invaluable nationwide spectrum. By ending the controversy that has delayed adoption of a standard and jeopardized these benefits, the

recent agreement breaks the logjam and paves the way for rapid Commission action to adopt a DTV standard and bring these benefits to the American public.

Moreover, such rapid action will bolster efforts to promote use of the ATSC DTV Standard in other countries, lowering costs and increasing choices for all consumers served by the standard. Rapid Commission action will allow the U.S. to capitalize on the world's best digital television technology, pioneered here in America.

We regret that although representatives of the portion of the film industry that has opposed the ATSC DTV Standard participated in the lengthy discussions leading up to this recent agreement, they have not joined in it. Their fundamental objective is to ensure that films be broadcast in their original aspect ratios, however, their request for such a requirement lies outside the issue of adopting an appropriate transmission standard. As we explained in detail in our Reply Comments, the matter of the aspect ratio in which a film will be broadcast is currently a contractual matter between the owner of the film and the broadcaster. But films can be shown in their original aspect ratio, if desired, by using letterboxing techniques, regardless of whether or not specific picture formats are included in the FCC transmission standard. With or without specific picture formats, the FCC transmission standard would impose no impediment whatsoever to a requirement, be it contractual or regulatory, that films be shown in their original aspect ratios. Thus, any further discussion of this issue should not involve the proposed FCC transmission standard, nor should it delay adoption of the standard as contemplated by the agreement.


Accordingly, the Commission should adopt before the end of this year the ATSC DTV Standard, except for its specific video format constraints, as the standard for digital terrestrial television broadcasts. In addition, the Commission should proceed as rapidly as


possible early next year to finalize channel assignments and service rules so that implementation of digital terrestrial television can begin in earnest. By acting now, the Commission will make the benefits of digital television a reality for the American public.

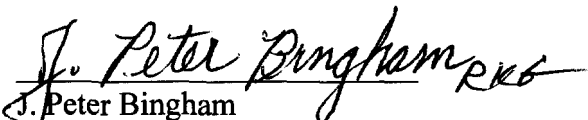
Respectfully submitted,

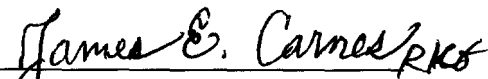
The Digital HDTV Grand Alliance

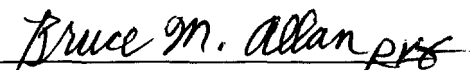

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